February 10, 2013

Board of Selectmen Community Preservation Committee Town of Acton 472 Main Street Acton, MA 01720

Dear members of the boards:

As a discussion of the Morrison Farm CPA application is on the Selectmen's agenda for February 11, I hope that you will seriously reconsider whether it should be moved forward at the present time.

The Implementation Plan ignores or seriously compromises much of what makes the farm an important historic resource. While the historic inventory forms were not appended to the application, (contrary to what is required by the CPC), I am attaching to this letter the National Register Eligibility Opinion from Mass. Historical Commission, which states the reasons for the property's significance even more succinctly. The opinion makes it clear that the farmstead itself is an important component in the farm's history and significance.

In fact, the house and barn, built together in 1932-33, constitute what is probably Acton's last surviving Depression-era farmstead. They are just as important as the icehouse foundation to the history of Acton, and are far more intact. If one of the plan's goals is to offer "living history" to the public, it should recognize that no exhibits or displays can do that better than the real thing—the buildings that are still part of the landscape.

The plan also falls short of meeting the goals and objectives of the numerous plans and studies that have preceded it—most recently the goals for the property voted by the Selectmen in July-November 2010 which followed the completion of the 2010 Feasibility Study (Kelleher Report), as well as the 2007 Morrison Farm Plan, and the 2020 Master Plan's sections on preserving community character. All of the past efforts that focused on Morrison Farm grappled with how to re-use the farm buildings, and many Acton citizens expected that an application for community preservation funds would present a way to do that—perhaps by combining historic-preservation with community-housing funds, or by simply utilizing preservation funds to stabilize and rehabilitate the buildings.

Instead, the CPA application seems to work against historic preservation purposes. It calls for the demolition of the barn, ignores the farmhouse, and would even relocate the 1895 Robbins alarm stone (which it repeatedly and erroneously calls the Robbins "Memorial".) It also proposes 5,000 square feet of new construction (building + decks and patios) in the middle of an important agricultural landscape identified by the community in Acton's 2004 Heritage Landscape Inventory and Report.

It appears that the proponents hope to pay for over a third of the project with Historic Preservation funds under the CPA. However, a careful reading of the qualifications for funding for rehabilitation makes it clear that this will not be possible. The CPA requires that "with respect to historic resources, 'rehabilitation' shall comply with the Standards for Rehabilitation stated in the United States Secretary of the Interior's Standards for the Treatment of Historic Properties."

Since, as the MHC opinion states, the various components of the farm all contribute to its historic significance, then the whole Morrison landscape—open space, buildings, sites,

structures and objects--must be treated according to the Secretary's Standards. I have also attached some excerpts from the guidelines for the Standards that show how to meet them when rehabilitating a large property where numerous historic resources exist.

Given the importance of the entire farm, including all its components, as one of Acton's irreplaceable historic resources, I hope that the Selectmen and CPC will send back this application until a revised proposal can be brought forward that addresses *all* of its historical aspects. Among those revisions should be:

- 1. A viable plan for the reuse and rehabilitation of the house and barn;
- 2. The retention of the National Register eligibility of the farm, thus both respecting the historic value of the farmstead and preserving the farm's eligibility for matching state historic preservation funding in the future;¹
- 3. To achieve the above, a reduction in size and a relocation of any new construction, including the community building, paved parking, and outdoor lighting;
- 4. The recognition that the Acton citizens of 1895 placed the alarm stone at the doorstep of the Robbins House foundation for an important reason that is still valid today.

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organizations.

¹ The Massachusetts Preservation Projects Fund is a 50% matching grant program to support properties listed in the State Register of Historic Places. Applicants must be municipalities or nonprofit